REMARKS

Overview

Claims 1, 2, 4, 5, 8, 10, 14-25, 45, 46, and 48-54 are pending in the present application. Claims 1 and 45 have been amended. The present response is an earnest effort to place all claims in proper form for immediate allowance. Reconsideration and passage to issuance is therefore respectfully requested.

Claim Rejections Under 35 U.S.C. § 103

Claims 1, 2, 4, 5, 10, 14-25, 45, 46, 48-4 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Alt, U.S. Patent No. 5,898,384, in view of Gordin et al., U.S. Patent No. 4,712,167. The rejections are respectfully traversed.

It is respectfully submitted that the combination of Alt, U.S. Patent No. 5,898,384, in view of Gordin, U.S. Patent No. 4,712,167, does not present a *prima facie* case of obviousness of the claims. The sole rejection is based on obviousness. Therefore, the Office Action admits that neither Alt nor Gordin alone discloses Applicant's claimed invention.

A *prima facie* case of obviousness requires that the two cited references present a combined teaching of the combination of Applicant's claims in the arrangement in the claims such that the combination of limitations of the claim are taught or suggested to one of ordinary skill in the art.

As pointed out in Applicant's prior response, Alt addresses a quite different concept than the claimed invention. Although Alt does discuss a form of control of remote electrically powered devices, a critical difference is as follows. Alt intentionally discloses and teaches the use of a control unit 16 at each electrical apparatus. Alt intentionally teaches this so that each

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apparatus can be independently controlled. Part of that independent control is that a set of possible operational protocols is preprogrammed into each control unit 16. As described at Alt, col. 10, in the example of billboard lighting, each billboard has a control unit 16. Each control unit 16 has five different operational protocols. Each protocol would cause the billboard lighting to turn on and off according to a different set of rules. Alt's "system control center" (col. 11, line 22) has, as a primary function, generation of a broadcast reference signal. This is intended to synchronize all of the control units 16 to one reference timing signal. The system central control can also send out programming signals. These signals can be used to change the on/off protocol at any control unit 16. However, the actual on/off control of billboard lights associated with any control unit 16 is controlled and managed by that on-site control unit 16 according to the lighting protocol it currently is set to.

Thus, Alt teaches that the actual timing of on/off of each set of billboard lights is programmed in and controlled by each on-site control unit 16. Alt control units 16 can be synchronized to one broadcast timing signal from central control. Essentially the database or lighting schedule is resident at the location of the lighting system. Central control synchronizes a universal timing reference for all control units 16. Central control can also allow a change in any timing protocol at any control unit 16. However, central control does not hold a unified database of lighting protocols for all control units 16.

In direct contrast, Applicant's independent claims 1 and 45, in accordance with one aspect of the invention disclosed in Applicant's Specification, describe a database at central control that includes information for each lighting system related to events and conditions. This centralized, unified database is a more efficient way to have a central location schedule and control operation of widely dispersed remote lighting systems. The central database instructs central control when

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any lighting system needs to be turned on or off. Central control then communicates, over its communication link, the appropriate instruction to the remote lighting system.

A practical example is set forth in detail in Applicant's Specification. A large set of subscribers can easily send each of their lighting schedules to the central control. Central control updates the unified database. Central control can easily amend or adjust the unified database. Individual controllers at remote locations of the various lighting systems don't have to be pre-programmed or individually programmed with a fixed set of on/off schedules. To clarify this distinction, claims 1 and 45 have been amended to emphasize the database relates to functions corresponding to each lighting system and communication link sends out data or instructions from centralized database when the database instructs the same.

This allows much greater flexibility than the Alt model of having a pre-programmed set of protocols at each remote control unit 16, try to keep all remote controls 16 on the same time reference, and allow a change between the set of pre-programmed protocols from the central control.

Gordin '167 merely describes a remote control panel 50 that allows an operator of a mobile lighting system to control the lights either from a hardwired onboard control panel or a remote control panel. It does not contemplate a data base at a centralized location that would instruct widely dispersed lighting systems. Remote control panel 50 is dedicated to the single mobile lighting system.
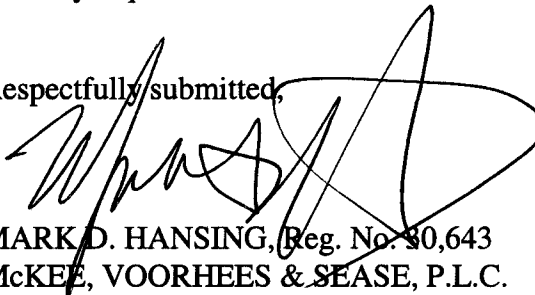
Therefore, the combination of Alt and Gordin '167 does not present a *prima facie* case of obviousness of Applicant's claims.

Conclusion

No fees or extensions of time are believed to be due in connection with this amendment; however, consider this a request for any extension inadvertently omitted, and charge any additional fees to Deposit Account No. 26-0084.

Reconsideration and allowance is respectfully requested.

Respectfully submitted,

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